

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

R. CATHY REARDON)	
On behalf of herself and all)	
similarly situated individuals,)	
)	
Plaintiffs,)	NO. 2:08cv1730 MRH
v.)	
CLOSETMAID CORPORATION)	Hon. Judge Mark R. Hornak
)	
Defendant.)	Class Action

JOINT PROPOSED JURY INSTRUCTIONS

Come now, the Plaintiff R. Cathy Reardon, on behalf of herself and all similarly situated individuals, and Defendant ClosetMaid Corporation, jointly, and submit their Proposed Jury Instructions. The parties have been working diligently to agree on joint proposed instructions, and at this time are filing as exhibits attached hereto the Plaintiff's Proposed Points for Charge (Ex. A) and Defendant's Proposed Jury Instructions (Ex. B). The parties continue to work diligently together to reduce these instructions by identifying overlap and resolving objections today through Monday, December 16, 2013.

Respectfully submitted,

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*Counsel for the Representative And
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CERTIFICATE OF SERVICE

I hereby certify that, on this 13th day of December, 2013, I caused a true and correct copy of Plaintiff's Opposition to Defendant's Motion *In Limine* to Exclude Evidence of Punitive Damages to be served by way of ECF Notification upon the following counsel of record for the Defendant:

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